

# Morgan Lewis

**Chelsea L. Conanan**

Associate

212.309.6326

Chelsea.Conanan@morganlewis.com

April 13, 2020

## **VIA ECF**

The Honorable Paul A. Engelmayer, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square, Courtroom 1305  
New York, New York 10007

Re: **Jacquelyn Musiello v. CBS Corporation et al., 20-CV-02569 (PAE) (JLC)**

Dear Your Honor:

We represent Defendants Entercom Communications Corp. (“Entercom”), CBS Corporation n/k/a ViacomCBS Inc. (for ease of reference only, “CBS”), CBS Radio Inc. n/k/a Entercom Media Corp. (for ease of reference only, “CBS Radio”), CBS Sports Radio Network Inc. n/k/a Entercom Sports Radio, LLC (for ease of reference only, “CBS Sports Radio”), Margaret Marion (“Marion”), and Dan Taylor (“Taylor”) (collectively “Defendants”) in the above-referenced action. We write, with Plaintiff’s consent, to respectfully request that the Court so-order counsel’s stipulation that the deadline for Defendants Marion’s and Taylor’s responses to Plaintiff’s Complaint be set to April 30, 2020.

This action was originally filed in the Supreme Court for the State of New York, Bronx County, on February 14, 2020 (and a “corrected” Complaint was filed on February 18, 2020). On March 25, 2020, Defendants filed a Notice of Removal in this Court pursuant to the Class Action Fairness Act, 28 U.S.C. § 1332(d). *See* Dkt. Nos. 1-4. At the time Defendants filed the Notice of Removal, neither Defendant Marion nor Defendant Taylor had been served with the Summons and Complaint (though each Defendant consented to the removal of the action to this Court).

On April 8, 2020, defense counsel informed Plaintiff’s counsel that they were authorized to accept service of process on behalf of Defendants Marion and Taylor. Counsel further agreed that Defendants Marion’s and Taylor’s deadline to respond to the Complaint would be April 30, 2020, which is the current deadline for the other Defendants in this action.

Accordingly, Defendants respectfully request that the Court so-order counsel’s stipulation that: (1) service of process for Defendants Marion and Taylor was acknowledged on April 8, 2020; and (2) Defendants Marion and Taylor’s responses to the Complaint are due by April 30, 2020.

**Morgan, Lewis & Bockius LLP**

101 Park Avenue  
New York, NY 10178-0060  
United States

📞 +1.212.309.6000  
📠 +1.212.309.6001

Hon. Paul A. Engelmayer, U.S.D.J.  
April 13, 2020  
Page 2

Thank you for Your Honor's time and consideration.

Dated: April 13, 2020  
New York, New York

Respectfully submitted,

MORGAN, LEWIS & BOCKIUS LLP

By: /s/ Chelsea L. Conanan

Chelsea L. Conanan

Liliya P. Kramer

101 Park Avenue

New York, NY 10178-0060

Tel.: (212) 309-6000

Fax: (212) 309-6001

[Chelsea.Conanan@morganlewis.com](mailto:Chelsea.Conanan@morganlewis.com)

[Liliya.Kramer@morganlewis.com](mailto:Liliya.Kramer@morganlewis.com)

Michael L. Banks (*pro hac vice* application  
forthcoming)

W. John Lee (*pro hac vice* application forthcoming)

1701 Market Street

Philadelphia, PA 19103

Tel.: (215) 963-5000

Fax: (215) 963-5001

[Michael.Banks@morganlewis.com](mailto:Michael.Banks@morganlewis.com)

[W.John.Lee@morganlewis.com](mailto:W.John.Lee@morganlewis.com)

*Attorneys for Defendants CBS Corporation, CBS  
Radio Inc., CBS Sports Radio Network Inc.,  
Entercom Communications Corp., Margaret Marion,  
and Dan Taylor*

cc: Donna H. Clancy, Esq., *Counsel for Plaintiff* (by ECF)

On April 2, 2020, the Court granted the motion of defendants CBS Corporation, CBS Radio Inc., CBS Sports Radio Network Inc., Entercom Communications Corp., and Margaret Marion to extend their time to answer or otherwise respond to the complaint until April 30, 2020. Dkt. 7. The Court grants the instant request by defendant Dan Taylor to similarly extend his time to respond to the complaint to April 30, 2020. SO ORDERED.

  
PAUL A. ENGELMAYER 4/13/2020  
United States District Judge